

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 | CELY TABLIZO,

Plaintiff,

12 | VS.

13 CITY OF LAS VEGAS, a political entity,
14 DOES 1-10, inclusive; ROE
CORPORATIONS 1-10, inclusive,

Defendant,

CASE NO. 2:14-cv-00763-APG-VCF

ORDER

STIPULATION AND REQUEST TO EXTEND DISPOSITIVE MOTION DEADLINE
(Third Request)

18 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff CELY
19 TABLIZO, by and through her attorney KIRK T. KENNEDY, ESQ., and the Defendant CITY
20 OF LAS VEGAS, by and through its attorney JACK O. ESLINGER, ESQ., Deputy City
21 Attorney, that the parties request that this Court extend the deadline for Dispositive Motions to
22 June 29, 2015. This is the third request by stipulation to extend this deadline.

23 **DESCRIPTION OF ACTION:** This is a gender discrimination based action under Title
24 VII, as well as a consolidated FMLA discrimination action. The Defendant has denied all claims
25 for relief.

1. Reasons Why the Parties Need Additional Time to File Dispositive Motions:

27 The City of Las Vegas has not received the deposition transcripts of Michael Scalzi and
28 Paula Adams taken on February 11, 2015. These transcripts are required to draft its dispositive

1 motion. The City of Las Vegas' counsel has been advised that the court reporter has experienced
 2 computer issues and illness which has resulted in the delay of providing these transcripts. The
 3 court reporter is confident the deposition transcripts will be available in the next 30 days.

4 The following list of the current dispositive motions deadlines and parties' proposed
 5 extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Dispositive Motions	May 29, 2015	June 29, 2015
Joint Pretrial Order	June 29, 2015	July 29, 2015

10 The Pretrial Order shall be filed by July 29, 2015, which is not more than thirty (30) days
 11 after the date set for filing dispositive motions in this case. This deadline is suspended if
 12 dispositive motions are timely filed and, in such case, the deadline for filing the pretrial order
 13 shall be thirty (30) days after decision on said dispositive motions, or by further order of the
 14 court. The disclosures required by FRCP Rule 26 (a)(3) shall be made in the joint pretrial order.

15 This Request for an extension of time is not sought for any improper purpose or other
 16 purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient
 17 time to file dispositive motions in this case and adequately prepare their respective cases for trial.

18 This is the third request for extension of time to file dispositive motions in this matter.
 19 The parties respectfully submit that the reasons set forth above constitute compelling reasons for
 20 the additional extension.

21 WHEREFORE, the parties respectfully request that this Court extend the deadline to file

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1 Dispositive Motions to June 29, 2015, and the deadline to file the Joint Pretrial Order to July 29,
2 2015.

3 DATED this 27th day of May, 2015. DATED this 27th day of May, 2015.

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5 BRADFORD R. JERBIC
City Attorney

6 By: /s/ Jack O. Eslinger
7 JACK O. ESLINGER
Deputy City Attorney
8 Nevada Bar No. 8443
495 South Main Street, Sixth Floor
9 Las Vegas, NV 89101
Attorneys for CITY OF LAS VEGAS

10
11 By: /s/ Kirk T. Kennedy
12 KIRK T. KENNEDY, ESQ.
Nevada Bar No. 5032
13 815 S. Casino Center Blvd.
Las Vegas, NV 89101
14 Attorney for Plaintiff

ORDER

15 IT IS SO ORDERED.
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16 UNITED STATES DISTRICT JUDGE
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